June 10, 2002

Mr. Jon L'hommedieu
Altec Engineering, Inc.
28274 County Road 20
Elkhart, IN 46517

Re: **039-15527-00188**
First Significant Permit Modification to
Part 70 No.: T 039-7452-00188

Dear Mr. L'hommedieu:

Altec Engineering, Inc. was issued a permit on May 11, 1998 for a stationary open mold fiberglass manufacturing operation. A letter requesting changes to this permit was received on January 28, 2002. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of changing the weight percent monomer content limit of the gel coats applied from 31% to 35% because the original BACT analysis established the VOC weight percent content based on the styrene content of the best scenario of the worst case gel coat (31%) only and did not account for the other VOC in the gel coat, methyl methacrylate (MMA), and incorporate the requirements of new promulgated rule 326 IAC 20-25 into the permit.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for (reviewers name) or extension (2 or 3-5691), or dial (317) 233-5691.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
SDF
cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz and Tony Pelath
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Altec Engineering, Inc.
28274 County Road 20
Elkhart, Indiana 46517

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operating Permit No.: 039-7452-00188	Date Issued: May 11, 1998

First Administrative Amendment No.: 039-14118-00188	Date Issued: March 30, 2001

First Significant Permit Modification No.: 039-15527-00188	Affected Pages: 3, 28, 29, 30, with 3a, 30a, 30b, 30c, 30d, 30e, 30f, 30g, and 30h, added.
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 10, 2002

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Schedule [326 IAC 2-7-6(3)]
C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]
C.13 Monitoring Methods [326 IAC 3]
C.14 Pressure Gauge Specifications
C.15 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
C.17 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
C.18 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(3)]
C.19 Actions Related to Noncompliance Demonstrated by a Stack Test

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.20 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-6] [326 IAC 2-7-19]
C.21 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
C.22 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)]
C.23 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

Stratospheric Ozone Protection

C.24 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS - Fiberglass Operations (GC1, CH-1, LAYUP)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
D.1.2 Fiberglass Lay-up Operation Monomer Weight Percent HAP Content Limits [326 IAC 20-25-3(a)]
D.1.3 Fiberglass Lay-up Operation Particulate Matter (PM) Overspray Limitations [326 IAC 6-3-2(c)]
D.1.4 Fiberglass Lay-up Particulate Control Device Operation Requirements [326 IAC 6-3-2(c)]
D.1.5 Fiberglass Lay-up Operation Application Method Requirements [326 IAC 20-25(b), (c), and (h), 326 IAC 20-25-4(1), and 326 IAC 8-1-6]
D.1.6 Fiberglass Lay-up Operation Work Practice Requirements [326 IAC 20-25-3(d) and 326 IAC 20-25-4]
D.1.7 Fiberglass Lay-up Operation Training Requirements [326 IAC 20-25-8]
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D.1.9 Testing Requirements [326 IAC 2-7-6(1)]
D.1.10 Compliance Determination, 326 IAC 8-1-6 Monomer Percent VOC Content and Emission Rate Limits
D.1.11 Compliance Determination, 326 IAC 20-25 Monomer Percent HAP Content Limits
D.1.12 Compliance Determination, 326 IAC 6-3-2 Particulate Matter (PM) Overspray Limits

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.13 Compliance Monitoring, 326 IAC 8-1-6 Monomer VOC Content and Emission Rate Limits
D.1.14 Compliance Monitoring, 326 IAC 20-25 Monomer HAP Content Limits

D.1.15 Compliance Monitoring, 326 IAC 6-3-2 Particulate Matter (PM) Overspray Limits
D.1.16 Compliance Monitoring, 326 IAC 20-25 Operator Training Requirements

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
D.1.17 Record Keeping Requirements
D.1.18 Reporting Requirements

Certification Form
Emergency/Deviation Occurrence Report
Quarterly Report Form
Quarterly Compliance Report

SECTION D.1

(1) One (1) fiberglass hand layup operation, identified as LAYUP, with a maximum capacity of 797 lbs/hr, utilizing one sprayless roll coater, and exhausting to stack S-2.

(2) One (1) gel coat operation, identified as GC1, utilizing HVLP-F air assisted airless spray guns, or non-atomized application system with a maximum capacity of 797 lbs/hr, using dry filters for particulate control and exhausting to stack S-1.

(3) One fiberglass chop operation, identified as CH-1, utilizing either HVLP-F air assisted airless guns or a flow coat system or non-atomized application system, with a maximum capacity of 797 lbs/hr, using dry filters for particulate control and exhausting to stacks S-2 & S-3.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

(a) Pursuant to CP 039-4936-00188, issued on November 21, 1996, and 326 IAC 8-1-6, the fiberglass panel manufacturing operations (CH-1, GC1 and LAYUP) are subject to BACT.

The BACT conditions are:

(1) utilization of the application methods specified in Condition D.1.5;

(2) the continual search to utilize lower styrene resins and gel coats with the company submitting an annual report due the 1st of the year on progress in utilizing lower styrene resins and gel coats as part of the BACT; and

(3) the average VOC content of the resins and gel coats shall not exceed 35 percent for the gel coats applied and 38 percent for the resins applied.

(b) Pursuant to CP 039-4936-00188, issued on November 21, 1996, and to satisfy condition C.1, the VOC emissions of these three (3) fiberglass processes shall not exceed 20.75 tons of VOC per month. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply.

D.1.2 Fiberglass Lay-up Operation Monomer Weight Percent HAP Content Limits [326 IAC 20-25-3(a)]

Pursuant to 326 IAC 20-25-3, the owner or operator shall limit the total monomer weight percent HAP content of the resins and gel coats applied as follows, based on a maximum monomer HAP content:

(a) Resin Monomer Content Limits:

The maximum resin monomer weight percent HAP content, as applied, shall not exceed:

(1) forty-eight percent (48%) when applying specialty products production resins;
(2) thirty-five percent (35%) when applying non-corrosion resistant unfilled production resins;

(3) thirty-eight percent (38%) when applying non-corrosion resistant filled production resins that have as applied monomer HAP contents greater than or equal to thirty-five percent (35%) by weight;
(4) forty-two percent (42%) when applying non-corrosion resistant production resins that are applied to thermoformed thermoplastic sheets;
(5) sixty percent (60%) when applying Class I, flame and smoke production resins;
(6) fifty-two percent (52%) when applying shrinkage controlled resins; and
(7) forty-three percent (43%) when applying tooling resins.

(b) Gel Coat Monomer Content Limits:

The maximum gel coat monomer weight percent HAP content, as applied, shall not exceed:

(1) thirty-seven percent (37%) when applying pigmented production gel coats;
(2) forty-four percent (44%) when applying clear production gel coats;
(3) forty-five percent (45%) when applying tooling gel coats;
(4) forty-five percent (45%) when applying pigmented production gel coats that are subject to American National Standards Institute (ANSI) standards;
(5) fifty percent (50%) when applying clear production gel coats subject to ANSI standards.

D.1.3 Fiberglass Lay-up Operation Particulate Matter (PM) Overspray Limitations [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c) (Particulate Emission Limitations), the PM from the fiberglass processes (CH-1, GC1 and LAYUP) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.4 Fiberglass Lay-up Particulate Control Device Operation Requirements [326 IAC 6-3-2(c)]

The dry filters for PM control shall be in operation at all times when the fiberglass lay-up processes GC1, CH-1 and LAYUP are in operation.

D.1.5 Fiberglass Lay-up Operation Application Method Requirements [326 IAC 20-25-3(b), (c), and (h), 326 IAC 20-25-4(1), and 326 IAC 8-1-6]

The owner or operator shall utilize the following application methods when applying the following resins and gel coats:

(a) Resin Application Methods:

The owner or operator shall apply the resins utilizing the following application methods:

(1) mechanical non-atomized application technology or manual application when applying:

(A) non-corrosion resistant unfilled production resins,
(B) Class I flame and smoke products production resins, and
(C) specialty products production resins;

and

(2) for all resins not specified in Part (a) of this Condition, the owner or operator may use manual application, mechanical non-atomized application technology, or high volume low pressure (HVLP) spray application.

The owner or operator shall not operate the mechanical non-atomized application equipment at pressures that atomize the material during the application process.

(b) Gel Coat Application Methods:

The owner or operator shall apply the gel coats utilizing manual application, mechanical non-atomized application technology, or high volume low pressure (HVLP) spray application.

* high volume low pressure (HVLP) Spray Technology shall be used to apply coating to a substrate by means of coating application equipment which operates between 20 and 50 pounds per square inch gauge (psig) air pressure at the 11:1 resin pump. Their 20:1 gel coat pump will normally operate between 50 and 80 pounds per square inch gauge (psig) air pressure. If higher pressures are required to spray lower styrene resin or gel coats, appropriate documentation will be maintained.

D.1.6 Fiberglass Lay-up Operation Work Practice Requirements [326 IAC 20-25-3(d) and 326 IAC 20-25-4]

The owner or operator shall comply with the following work practice requirements:

(a) Changing Resins and Cleaning Resin and Gel Coat Equipment:

(1) Changing Resins:

The owner or operator shall direct all solvent sprayed during resin changes into solvent collection containers.

(2) Cleaning Resin and Gel Coat Equipment:

The owner or operator shall clean the resin and gel coat application equipment as follows:

(A) All routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, shall be conducted:

(i) utilizing solvents that do not contain any hazardous air pollutants (HAP), unless cured resins and/or gel coats are being removed from the application equipment; and
(ii) such that the solvents sprayed during clean-up or resin and/or gel coat changes are directed into solvent collection containers.

(B) All cured resins and/or gel coats removed from the application equipment may be removed by any type of solvent that has weight percent HAP contents less than or equal to the respective HAP contents of the worst case HAP containing solvents submitted in the permit application of the most recent approved permit.
(C) All other cleanup activities shall be performed utilizing solvents that do not contain any HAPs.

For the purposes of this Condition, all recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight shall be considered to contain no HAP and thus can be used for any cleaning activity.

(b) Storage of Materials:

The owner or operator shall store the following materials in closed containers:

(1) all resins and gel coats that contain hazardous air pollutants (HAPs),
(2) all other materials other than resins and gel coats that contain HAPs,

(3) all HAP containing materials stored in mixing containers with a capacity equal to or greater than fifty-five (55) gallons,
(4) all clean-up rags that contain HAPs,
(5) all waste resins and gel coats that contain HAPs, and
(6) all waste HAP containing materials that are not resins or gel coats.

All materials not listed in (b)(1) through (b)(6) may be stored in any type of container, but shall be stored in such a manner as to minimize the potential for spills and other pollutant emissions.

(c) Maintenance of Storage Containers:

The owner or operator shall maintain each container subject to the requirements of this Condition such that:

(1) there are no visible gaps when the lid is closed,
(2) each applicable container closed at all times, except when:

(A) equipment is being placed in or removed from the container,
(B) HAP containing materials are being added or removed,
(C) mixing or pumping equipment is being placed into or removed from a container, or
(D) when mixing or pumping is taking place; and

(3) the potential for spills and other pollutant emissions is minimized.

For the purposes of this Condition, gaps are defined as any open space between the side of the lid and the upper lip of the container. Openings at the top of a container for the purpose of production shall not be considered a gap provided the openings are designed to minimize the opening size.

D.1.7 Fiberglass Lay-up Operation Training Requirements [326 IAC 20-25-8]

The owner or operator shall comply with the following training requirements:

All new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications, shall be trained the proper resin and gel coat handling and application techniques as follows, with each applicable employee being trained according to the schedule specified in this Condition:

(a) Training Techniques and Procedures:

The training to be given shall consist of initial and refresher training, with said initial and refresher training including, at a minimum, the appropriate:

(1) application techniques,
(2) equipment cleaning procedures,
(3) equipment setup and adjustment to minimize material usage and overspray, and
(4) other material storage and handling techniques that minimize regulated pollutant emissions.

(b) Training Schedule:

Each applicable employee shall be trained the techniques and procedures required in (a) of this Condition according to the following schedules:

(1) All applicable personnel hired after February 5, 2001, shall be trained within fifteen (15) days of hiring, unless the person(s) hired:

(A) has been trained by another owner or operator subject to 326 IAC 20-25,
(B) has written documentation demonstrating that they have up-to-date training, and
(C) has provided the documentation required in (b)(1)(B) of this Condition to the new employer.

(2) All applicable personnel hired prior to February 5, 2001, shall be evaluated by a supervisor within 30 days of the date of issuance of this permit. Should the supervisor determine that training of any evaluated employee is required, the owner or operator shall train said employee within fifteen (15) days of the evaluation.

(3) All applicable personnel subject to the training requirements of this Condition shall be given refresher training annually, to ensure that the training goals of this Condition are maintained.

D.1.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.9 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

D.1.10 Compliance Determination, 326 IAC 8-1-6 Monomer Percent VOC Content and Emission Rate Limits

(a) The owner or operator shall determine compliance with the VOC content limitations of Condition D.1.1(a)(3) by determining:

(1) on a monthly basis, the actual monomer percent VOC content of the applicable resins and gel coats utilizing Method 24 of 40 CFR 60, Appendix A, or

(2) on a daily basis, a volume weighted average monomer percent VOC content of all resins and a volume weighted average monomer percent VOC content of all gel coats, using formulation data supplied by the resin and gel coating manufacturer(s), provided the Office of Air Quality determines that the formulation data used is equivalent to the Method 24 results.

Even if the owner or operator uses the approved formulation data to determine the VOC content of the resins and gel coats, the Indiana Department of Environmental Management (IDEM), OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Should all of the applicable resin and gel coat component materials consist of materials that are both VOCs and HAPs, the owner or operator may use the VOC contents of the respective resins and gel coats determined in (a)(2) of this Condition to satisfy the HAP content determination requirements of Condition D.1.11(b).

(b) The owner or operator shall determine compliance with the VOC emission rate limit of Condition D.1.1(b) by determining, on a monthly basis, the VOC emissions from all VOC containing materials used at the source in tons per month, utilizing the most recent approved version of the “Unified Emission Factors for Open Molding of Composites”*.

* Copies of the “Compilation of Emission Factors” and “Unified Emission Factors for Open Molding of Composites” are available for copying from the Office of Air Quality, Department of Environmental Management, Indiana Government Center North, 100 North Senate Avenue, Indianapolis, Indiana.

D.1.11 Compliance Determination, 326 IAC 20-25 Monomer Percent HAP Content Limits

The owner or operator shall, on a monthly basis, determine compliance with the monomer HAP content limits of Condition D.1.2 by determining:

(a) on a monthly basis, the actual monomer percent HAP content via sampling and analysis, utilizing, as applicable, one of the following test methods:

(1) 40 CFR 60, Method 24, Appendix A (July 1, 1998)*. This method may be modified to allow measurement of the volatile HAP content of the resins or gel coats via use of uncatalyzed resin or gel coat samples, or
(2) 40 CFR 63, Method 311, Appendix A (July 1, 1998)*;

* Copies of the Code of Federal Regulation (CFR) referenced in this section may be obtained from the Government Printing Office, Washington, D. C. 20204 or are available for copying from the Office of Air Quality, Department of Environmental Management, Indiana Government Center-North, 100 North Senate Avenue, Indianapolis, Indiana, 46206.

or

(b) on a daily basis, a volume weighted average monomer percent HAP content of all resins and a volume weighted average monomer percent HAP content of all gel coats using formulation data supplied by the resin and gel coating manufacturer(s), provided the Office of Air Quality determines that the formulation data used is equivalent to the Method 24 results.

D.1.12 Compliance Determination, 326 IAC 6-3-2 Particulate Matter (PM) Overspray Limits

The owner or operator shall determine compliance with the PM overspray limits of Condition D.1.3 by:

(a) performing daily inspections of the dry filter systems to determine whether or not the placement, integrity and particle loading of the filters is adequate,

(b) performing weekly observations of the overspray emissions from the fiberglass lay-up exhaust stacks to determine whether or not the dry filters are performing adequately during normal operation of the respective fiberglass lay-up processes,

(c) performing monthly inspections of the emissions from fiberglass lay-up process stacks to determine whether or not the emissions from the stack are normal and if there is overspray present on the rooftops and the nearby ground, and

(d) performing all additional inspections and observations prescribed by the Preventive Maintenance Plan.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.13 Compliance Monitoring, 326 IAC 8-1-6 Monomer VOC Content and Emission Rate Limits

(a) The owner or operator shall, for the monomer percent VOC content limits of Condition D.1.1(a)(3), as applicable, record either:

(1) the monthly actual resin and gel coat monomer VOC contents as determined in Condition D.1.10(a)(1),

or

(2) the daily volume weighted average resin and gel coat monomer VOC contents as determined in Condition D.1.10(a)(2).

Should the applicable resin and gel coat component materials consist of materials that are both VOCs and HAPs, the owner or operator may use the VOC contents of the respective resins and gel coats recorded in (a)(2) of this Condition to satisfy the HAP content monitoring requirements of Condition D.1.14(b).

If the owner or operator utilizes the VOC contents recorded in this Condition to satisfy the HAP monitoring requirements, the owner or operator shall also include a statement that the VOC contents are equal the HAP contents and that the recorded values are satisfying VOC and HAP content record keeping requirements of Condition D.1.17(a) and (c).

(b) The owner or operator shall, for the VOC emission rate limit of Condition D.1.1(b), record the monthly VOC emissions determined in Condition D.1.10(b).

All information required to be recorded in this Condition shall be recorded in a form that is suitable and readily available for inspection and review by the Office of Air Quality (OAQ).

D.1.14 Compliance Monitoring, 326 IAC 20-25 Monomer HAP Content Limits

The owner or operator shall, as applicable, record either:

(a) the actual resin and gel coat monomer percent HAP contents as determined in Condition 1.11(a),

or

(b) the daily volume weight average resin and gel coat monomer percent VOC contents as determined in Condition D.1.11(b).

All information required to be recorded in this Condition shall be recorded in a form that is suitable and readily available for inspection and review by the Office of Air Quality (OAQ).

D.1.15 Compliance Monitoring, 326 IAC 6-3-2 Particulate Matter (PM) Overspray Limits

The owner or operator shall, for the fiberglass lay-up process dry filter systems and exhaust:

(a) record the results of the inspections required in Condition D.1.12(a), documenting whether or not the placement, integrity and particle loading of the filters is adequate,

(b) record the results of the observations required in Condition D.1.12(b), documenting whether or not the dry filters are performing adequately during normal operation of the respective fiberglass lay-up processes,

(c) record the results of the inspections required on Condition D.1.12(c), documenting whether or not the emissions from the stack are normal and if there is overspray present on the rooftops and the nearby ground, and

(d) record the results of all additional inspections and observations specified in Condition D.1.12(d).

Should the owner or operator observe that the integrity and particle loading of the filters is not adequate, that the dry filters are not performing adequately during normal operation of the respective fiberglass lay-up processes, that there is a noticeable change in overspray emissions from the stack or surrounding evidence of abnormal overspray emissions, or that there are any parameters under the Preventive Maintenance Plan that are determined to be abnormal, the owner or operator shall take the appropriate response steps as specified in the Compliance Response Plan required in Condition C.18.

D.1.16 Compliance Monitoring, 326 IAC 20-25 Operator Training Requirements

The owner or operator shall demonstrate compliance with the training requirements of Condition D.1.7 by drafting and updating (as necessary):

(a) a copy of the current training program, and

(b) a list of all current personnel, by name, that are required to be trained, the dates they were trained, and the date of the most recent refresher training.

The information required to be recorded in this Condition shall be recorded in a form that is suitable and readily available for inspection and review by the Office of Air Quality (OAQ).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.17 Record Keeping Requirements

(a) To document compliance with VOC content limits of Condition D.1.1(a)(3), the owner or operator shall maintain:

(1) a summary of the actual as applied percent VOC contents for each month, as recorded pursuant to the requirements of Condition D.1.13(a)(1), if the owner or operator determines compliance with the VOC content limits utilizing Method 24 tests specified in Condition D.1.10(a)(1).

The summary shall include the applicable month and year, the actual resin percent VOC contents, the actual gel coat percent VOC contents, and the respective resin and gel coat percent VOC content limits.

(2) a summary of the as applied daily volume weighted average resin and gel coat percent VOC contents for each month, as recorded pursuant to the requirements of Condition D.1.13(a)(2), copies of the calculations used to determine the daily volume weighted averages, copies of the as supplied and as applied VOC data sheets, if the owner or operator determines compliance with the VOC content limits utilizing the daily volume weighted averages specified in Condition D.1.10(a)(2).

The summary shall include the dates of use, the resin volume weighted average percent VOC content for that date, the gel coat volume weighted average percent VOC content for that date, and the respective resin and gel coat percent VOC content limits.

If the owner or operator utilizes the VOC record keeping requirements of (a)(2) of this condition to satisfy the HAP record keeping requirements of (c)(2) of this condition, as provided for in Condition D.1.13(a)(2), the owner or operator shall, in addition to the other records required, maintain copies of the resin and gel coat Material Safety Data Sheets (MSDS).

(b) To document compliance with VOC emission rate limits of Condition D.1.1(b), the owner or operator shall, for each month, maintain a summary of the VOC emissions generated, as recorded pursuant to the requirements of Condition D.1.13(b), copies of the calculations used to determine the VOC emissions, copies of purchase orders and invoices necessary to verify the type and amount used, and as supplied and as applied VOC data sheets.

The summary shall include the applicable month and year, the monthly VOC limit in tons per month, the amount of each resin used that month, the amount of gel coat used that month, the emission factor used to determine the emissions, the monthly VOC emissions for each resin and gel coat in tons per month, the amount of each clean-up solvent used, the amount of each reducing solvent used, the weight percent VOC of each solvent, the estimated monthly VOC emissions for each solvent in tons per month, and the total monthly VOC emissions from the fiberglass lay-up operation in tons per month.

(c) To document compliance with the monomer weight percent HAP content limits of Condition D.1.2, the owner or operator shall maintain:

(1) a summary of the actual as applied percent HAP contents for each month, as recorded pursuant to the requirements of Condition D.1.14(a), if the owner or operator determines compliance with the HAP content limits utilizing the test methods specified in Condition D.1.11(a).

The summary shall include the applicable month and year, the actual resin percent HAP contents, the actual gel coat percent HAP contents, and the respective resin and gel coat percent HAP content limits.

(2) a summary of the as applied daily volume weighted average resin and gel coat percent HAP contents for each month, as recorded pursuant to the requirements of Condition D.1.14(b), copies of the calculations used to determine the daily volume weighted averages, and copies of resin and gel coat Material Safety Data Sheets (MSDS), if the owner or operator determines compliance with the HAP content limits utilizing the daily volume weighted averages specified in Condition D.1.11(b).

The summary shall include the dates of use, the resin volume weighted average percent HAP content for that date, the gel coat volume weighted average percent HAP content for that date, and the respective resin and gel coat percent HAP content limits.

(d) To document compliance with PM overspray limits of Condition D.1.3, the owner or operator shall maintain a log of weekly overspray observations, daily and monthly inspections, and the additional inspections prescribed by the Preventive Maintenance Plan, recorded pursuant to the requirements of Condition D.1.15.

(e) To document compliance with the operator training requirements of Condition D.1.7, the owner or operator shall keep and maintain a copy of the most current updated operator-training program and a list of all trained personnel, as recorded pursuant to the requirements of Condition D.1.16.

The owner or operator need not maintain prior training programs, training information on former personnel, or prior trained personnel lists.

(f) To document compliance with the notification requirements of Condition D.1.18(c), the owner or operator shall keep and maintain a copy of all notifications submitted pursuant to the requirements of Condition D.1.18(c). Said notifications shall be in a form suitable and readily available for inspection and review by the Office of Air Quality (OAQ).

(g) To document compliance with the reporting requirements of Condition D.1.18(d), the owner or operator shall keep and maintain copies of all reports submitted pursuant to the requirements of Condition D.1.18(d). Said notifications shall be in a form suitable and readily available for inspection and review by the Office of Air Quality (OAQ).

All records except for the exemptions specified in paragraph (e) of this Condition shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.18 Reporting Requirements

The owner or operator shall submit the following:

(a) The owner or operator shall submit the 326 IAC 8-1-6 BACT annual summary report as required in Condition D.1.1(a)(2).

(b) The owner or operator shall submit a quarterly summary of the monthly VOC emissions required in Condition D.1.17(b). Said summary shall include a copy of the summary report form included at the end of this permit, or its equivalent, and a copy of all supporting calculations, with the summary and supporting calculations being submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015,

within thirty (30) days after the end of the quarter being reported.

(c) On or before June 1, 2001, the owner or operator shall submit an initial notification to the Office of Air Quality (OAQ). Said notification shall include:

(1) the name and address of the owner or operator,
(2) the address of the physical location of the source, and
(3) a statement, signed by a responsible official, as defined in 326 IAC 2-7-1(34), verifying that the source is subject to the 326 IAC 20-25.

(d) On or before March 1, 2002, the owner or operator shall submit an initial statement of compliance to the Office of Air Quality (OAQ). Said initial statement shall include:

(1) the name and address of the owner or operator,
(2) the address of the physical location of the source, and
(3) a statement signed by a responsible official, as defined in 326 IAC 2-7-1(34), certifying:

(A) that the source achieved compliance on or before January 1, 2002,
(B) the method used to achieve compliance, and
(C) that the source is in compliance with all the requirements of this rule.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document for a Significant Permit Modification

Source Name:	Altec Engineering, Inc.
Source Location:	28274 County Road 20, Elkhart, IN 46517
County:	Elkhart
SIC Code:	3070
Operation Permit No.:	039-7452-00188
Date Issued:	May 11, 1998
Significant Permit Modification No.:	039-15527-00188
Permit Reviewer:	SDF

On February 25, 2002, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth located in Elkhart, Indiana, stating that Altec Engineering, Inc. had applied for a significant permit modification. The notice also stated that OAQ proposed to issue the permit modification and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On March 20, 2002, the Air Compliance Section of the Office of Air Quality submitted the following comment on the proposed permit modification. A summary of the comment and the corresponding response is as follows (changes are bolded for emphasis):

Comment 1:

In addition to the changes listed in the draft modification, Condition No. B.11 of the original permit needs to be changed to require submittal of the Annual Compliance Certification by April 15 instead of July 1st.

Response 1:

The only changes made as a result of the proposed significant permit modification are to Section D.1.

Condition B.11 of the existing issued Title V permit located in the Permits Branch Fileroom (039-7452-00188) is as follows:

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Paragraph (a) of this condition already requires the certification to be submitted by no later than April 15th of each year. Thus no changes are required.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Modification to a Part 70 Permit

Source Background and Description

Source Name:	Altec Engineering, Inc.
Source Location:	28274 County Road 20, Elkhart, IN 46517
County:	Elkhart
SIC Code:	3070
Operation Permit No.:	039-7452-00188
Date Issued:	May 11, 1998
Significant Permit Modification No.:	039-15527-00188
Permit Reviewer:	SDF

The Office of Air Quality (OAQ) has reviewed an application from Altec Engineering, Inc. relating to changes to the 326 IAC 8-1-6 BACT analysis of their existing Title V permit and incorporation of the new 326 IAC 20-25 applicable requirements.

Request

On January 28, 2002, Altec Engineering, Inc. submitted an application to change the BACT analysis of their existing Title V permit to change the weight percent monomer content limit of the gel coats applied from 31% to 35% because the original BACT analysis established the VOC weight percent content based on the styrene content of the best scenario of the worst case gel coat (31%) only and did not account for the other VOC in the gel coat, methyl methacrylate (MMA).

Review of the original BACT determination for volatile organic compounds (VOC) revealed that the methyl methacrylate (MMA) content was not accounted for when establishing the gel coat monomer weight percent VOC content limit and that the limit should have included the MMA weight percent VOC content of 4%.

Thus, instead of the resin and gel coat limits being a “styrene” limit, the 326 IAC 8-1-6 BACT resin and gel coat weight percent VOC content limit shall be changed to a “VOC” content limit with the weight percent monomer VOC content being the sum of the styrene and MMA (35%).

Although there will be an increase in the weight percent monomer content, correcting this limit will not be considered a relaxation of the original 326 IAC 8-1-6 VOC BACT because the source VOC PTE will still be 249 tons VOC per year with the short term limit still being 20.39 tons VOC per month.

In addition, while reviewing the 326 IAC 8-1-6 BACT requirements, it has been determined that new promulgated rule, 326 IAC 20-25, applies to the fiberglass lay-up operation. 326 IAC 20-25 establishes hazardous air pollutant (HAP) limits and requirements for open mold fiberglass lay-up operations including monomer weight percent HAP content limits, and application method, work practice, and training requirements. These limits and requirements shall be incorporated into the permit as well.

Incorporating the 326 IAC 20-25 requirements into the permit results in conflicts with the 326 IAC 8-1-6 BACT requirements. In order to incorporate the proper requirements into the existing Title V permit, the more stringent of the like requirements have been used as provided for in 326 IAC 20-25-1(b), which states "in the event there is a conflict between this rule and any existing federal or state statute or federal or state rule, the more stringent requirements shall apply".

The 326 IAC 8-1-6 BACT and 326 IAC 20-25 requirements are therefore incorporated into the permit as follows:

1. Resin and Gel Coat VOC and HAP Weight Percent Content Limits:

   The resin and gel coat content limits of the 326 IAC 8-1-6 BACT limit the "VOC" content of the resins and gel coats. The content limits of 326 IAC 20-25 limit the "HAP" content of the resins and gel coats.

   While in most cases, the components of the resins and gel coats are both VOCs and HAPs, there exists the possibility that one or more components of the resins and/or gel coats may be a VOC or HAP only.

   Thus, the 326 IAC 8-1-6 BACT VOC content limits and the 326 IAC 20-25 HAP limits shall be separate limits with the VOC content limits remaining in the 326 IAC 8-1-6 BACT requirements of Condition D.1.1 and the HAP content limits being included in the new condition for the monomer HAP weight percent content limit (Condition D.1.2).

2. VOC Emission Rate Limits and Lower Styrene Content Research Requirements:

   The 326 IAC 8-1-6 BACT VOC emission rate limits of 249 tons VOC/yr (20.39 tons VOC/month) and the requirement to continue to search for lower styrene resins and gel coats, are not found in 326 IAC 20-25. Therefore, these requirements shall still be required as part of the 326 IAC 8-1-6 BACT requirements of Condition D.1.1.

3. Resin and Gel Coat Application Methods:

   The 326 IAC 8-1-6 BACT requires the owner or operator to apply the resins and gel coats utilizing high volume low pressure (HVLP) air assisted airless spray equipment or a non-atomized application system. 326 IAC 20-25 requires the owner or operator to apply the resin and gel coats utilizing either manual application, non-atomized application methods, or mechanical application methods, depending on the type of resins and gel coats applied.

   The gel coat application requirements of the 326 IAC 8-1-6 BACT are more stringent than the 326 IAC 20-25 counterparts because 326 IAC 20-25 allows the source to apply gel coats using air assisted airless, airless, or any equivalent which are less stringent application methods than the HVLP and non-atomized application equipment specified in the 326 IAC 8-1-6 BACT.

   The resin application requirements of 326 IAC 20-25 are more stringent than the 326 IAC 8-1-6 BACT requirements when applying non-corrosion resistant unfilled production resins, specialty products production resins, and Class I flame and smoke products production resins because the 326 IAC 8-1-6 BACT allows the source to use HVLP which is a less stringent application method than the mechanical non-atomized application technology or manual application specified in 326 IAC 20-25.

The resin application requirements of the 326 IAC 8-1-6 BACT are more stringent than the 326 IAC 20-25 requirements when applying all other types of resins because 326 IAC 20-25 allows the source to use airless, air-assisted airless, or an approved equivalent, which are less stringent application methods than the HVLP and non-atomized application equipment specified in the 326 IAC 8-1-6 BACT.

Therefore, the owner or operator shall be required to apply non-corrosion resistant unfilled production resins, specialty products production resins, and Class I flame and smoke products production resins utilizing the 326 IAC 20-25 application techniques, mechanical non-atomized application technology or manual application.

The owner or operator shall be required to apply all other resins and the gel coats utilizing the 326 IAC 8-1-6 application techniques, HVLP and non-atomized application equipment.

4. All Other Requirements and Changes to Existing Conditions:

   The remaining existing conditions shall be revised and updated as needed and new compliance determination, compliance monitoring, record keeping, and reporting requirements drafted to incorporate all other necessary requirements.

The proposed changes will not generate an increase in the production rate or result in an increase in the potential to emit.

The proposed changes shall be incorporated into the existing Title V permit via a significant permit modification pursuant to 326 IAC 2-7-12(d) which states that permit modifications that do not qualify for an administrative amendment under 326 IAC 2-7-11, or a minor permit modification under 326 IAC 2-7-12(b), shall be incorporated into a Part 70 permit via a significant permit modification.

Existing Approvals

The source has been operating under Title V 039-7452-00188, issued on May 11, 1998 and the following approvals:

(1) First Administrative Amendment: 039-14118-00188 Date Issued: 03-30-01
(2) Second Administrative Amendment: 039-14451-00188 Date Issued: Pending

Enforcement Issue

There are no Enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete application for the purposes of this review was received on January 28, 2002.

Emission Calculations

There are no emission calculations associated with the proposed permit modification.

Potential to Emit

The proposed changes will not generate an increase in the source potential to emit (PTE).

Justification for the Significant Permit Modification

The proposed changes shall be incorporated into the existing Title V permit via a significant permit modification pursuant to 326 IAC 2-7-12(d) which states that permit modifications that do not qualify for an administrative amendment under 326 IAC 2-7-11, or a minor permit modification under 326 IAC 2-7-12(b), shall be incorporated into an existing Part 70 permit via a significant permit modification.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM_{10}	Attainment or Unclassifiable
SO_2	Attainment or Unclassifiable
NO_2	Attainment or Unclassifiable
Ozone	Maintenance Attainment
CO	Attainment or Unclassifiable
Lead	Attainment or Unclassifiable

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as maintenance attainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21

(b) Elkhart County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source Emissions	249	249	<100	<100	249	<100	>10	>25

PSD Levels	250	250	250	250	250	250	-	-
Part 70 Levels	-	100	100	100	100	100	10	25

(a) This existing source is not a major a PSD stationary source because it is not one of the 28 listed source categories and there are no regulated pollutant emissions that exceed the applicable rate of 250 tons per year or more.

(b) This existing source is a Title V major stationary source because the PM10 and VOC PTE exceed the applicable level of 100 tons per year, the single HAP PTE exceeds the applicable level of 10 tons/yr, and the combined HAP PTE exceeds the applicable level of 25 tons/yr.

Potential to Emit After the Proposed Changes

The source PTE after the proposed changes is listed below:

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source Emissions	249	249	<100	<100	249	<100	>10	>25

PSD Levels	250	250	250	250	250	250	-	-
Part 70 Levels	-	100	100	100	100	100	10	25

(a) This existing source after the proposed changes is still not a major a PSD stationary source because the source is still not one of the 28 listed source categories and there are still no regulated pollutant emissions that exceed the applicable rate of 250 tons per year or more.

(b) This existing source after the proposed changes is still a Title V major stationary source because the PM10 and VOC PTE still exceed the applicable level of 100 tons per year, the single HAP PTE still exceeds the applicable level of 10 tons/yr, and the combined HAP PTE still exceeds the applicable level of 25 tons/yr.

Federal Rule Applicability

New Source Performance Standards (NSPS):

There are no New Source Performance Standards (326 IAC 12 and 40 CFR Part 60) that become applicable due to the proposed changes.

National Emission Standards for Hazardous Air Pollutants (NESHAPs):

There are no National Emission Standards for Hazardous Air Pollutants (326 IAC 14 and 20 and 40 CFR Part 61 and 63) that become applicable due to the proposed changes.

State Rule Applicability

Entire State Rule Applicability:

There are no new entire state rules that become applicable due to the proposed changes.

Individual State Rule Applicability*:*

326 IAC 20-25 (Fiberglass Lay-up Operation Limits and Standards):

The fiberglass lay-up operation is subject to the requirements of 326 IAC 20-25 because:

(a) the single and combined HAP emissions exceed the applicable levels of 10 and 25 tons per year, respectively,

(b) the fiberglass lay-up operation is an open mold operation,

(c) the source manufactures reinforced plastic composites parts,

(d) the source has emission units where resins and gel coats that contain styrene are applied and cured using the open molding process,

(e) the source has actual styrene emissions that exceed 3 tons per year, and

(f) there have been no revisions to the existing source BACT after June 28, 1998 and before February 5, 2001.

To achieve compliance, the owner or operator shall be required to meet the HAP weight percent monomer content limits and the application method, work practice, training, and notification requirements.

Changes

The operation conditions of Section D.1 of existing Title V 039-7452-00188, issued on May 11, 1998, shall be modified as follows to include the changes to the 326 IAC 8-1-6 BACT and the new conditions associated with the 326 IAC 20-25 requirements. In addition all of the conditions of Section D.1 are renumbered accordingly to account for the conditions that have been added. New language is in bold type and deleted language has been struck-out.

SECTION D.1

(1) One (1) fiberglass hand layup operation, identified as LAYUP, with a maximum capacity of 797 lbs/hr, utilizing one sprayless roll coater, and exhausting to stack S-2.

(2) One (1) gel coat operation, identified as GC1, utilizing HVLP-F air assisted airless spray guns, or non-atomized application system with a maximum capacity of 797 lbs/hr, using dry filters for particulate control and exhausting to stack S-1.

(3) One fiberglass chop operation, identified as CH-1, utilizing either HVLP-F air assisted airless guns or a flow coat system or non-atomized application system, with a maximum capacity of 797 lbs/hr, using dry filters for particulate control and exhausting to stacks S-2 & S-3.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

Condition D.1.1:

Condition D.1.1 shall be modified to:

(a) divide the BACT requirements into separate entities,
(b) change the content limits to "VOC" limits instead of "styrene" limits,
(c) change the fiberglass lay-up application method requirements to reference new Condition D.1.5 because new condition D.1.5 combines the application method requirements of both 326 IAC 8-1-6 and 326 IAC 20-25, requiring the most stringent methods of the two rules, and
(d) the gel coat content limit has been revised to include both the styrene and methyl methacrylate contents of the best scenario of the worst case gel coat applied.

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

(a) Pursuant to CP 039-4936-00188, issued on November 21, 1996, and 326 IAC 8-1-6, the fiberglass panel manufacturing operations (CH-1, GC1 and LAYUP) are subject to BACT.

The BACT conditions are:

(1) utilization of **the** ~~Magnum HVLP-F Air Assisted Airless (AAA)* spray equipment or non-atomized~~ application ~~system~~ **methods specified in Condition D.1.5**; ~~and~~

(2) the continual search to utilize lower styrene resins and gel coats~~.~~ **with ~~T~~the company ~~shall also~~ submitting an annual report due the 1st of the year on progress in utilizing lower styrene resins and gel coats as part of the BACT; and**

(3) the ~~use of lower styrene~~ **average VOC content of the** resins and gel coats shall ~~be based on a current average of~~ **not exceed** 3~~1~~**5** percent ~~styrene~~ for **the** gel coats **applied** and 38 percent ~~styrene~~ for **the** resins **applied**. ~~The company shall also submit an annual report due the 1st of the year on progress in utilizing lower styrene resins and gel coats as part of the BACT.~~

~~* Air Assisted Airless (AAA) Spray Technology shall be used to apply coating to a substrate by means of coating application equipment which operates between 20 and 50 pounds per square inch gauge (psig) air pressure at the 11:1 resin pump. Their 20:1 gel coat pump will normally operate between 50 and 80 pounds per square inch gauge (psig) air pressure. If higher pressures are required to spray lower styrene resin or gel coats, appropriate documentation will be maintained.~~

(b) Pursuant to CP 039-4936-00188, issued on November 21, 1996, and to satisfy condition C.1, the VOC emissions of these three (3) fiberglass ~~operations~~ **processes** shall not exceed 20.75 tons of VOC per month. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply.

Condition D.1.2:

A new Condition D.1.2 shall be drafted to establish the 326 IAC 20-25 fiberglass lay-up monomer weight percent HAP content limits.

D.1.2 Fiberglass Lay-up Operation Monomer Weight Percent HAP Content Limits [326 IAC 20-25-3(a)]

Pursuant to 326 IAC 20-25-3, the owner or operator shall limit the total monomer weight percent HAP content of the resins and gel coats applied as follows, based on a maximum monomer HAP content:

(a) Resin Monomer Content Limits:

The maximum resin monomer weight percent HAP content, as applied, shall not exceed:

(1) forty-eight percent (48%) when applying specialty products production resins;
(2) thirty-five percent (35%) when applying non-corrosion resistant unfilled production resins;
(3) thirty-eight percent (38%) when applying non-corrosion resistant filled production resins that have as applied monomer HAP contents greater than or equal to thirty-five percent (35%) by weight;
(4) forty-two percent (42%) when applying non-corrosion resistant production resins that are applied to thermoformed thermoplastic sheets;
(5) sixty percent (60%) when applying Class I, flame and smoke production resins;
(6) fifty-two percent (52%) when applying shrinkage controlled resins; and
(7) forty-three percent (43%) when applying tooling resins.

(b) Gel Coat Monomer Content Limits:

The maximum gel coat monomer weight percent HAP content, as applied, shall not exceed:

(1) thirty-seven percent (37%) when applying pigmented production gel coats;
(2) forty-four percent (44%) when applying clear production gel coats;
(3) forty-five percent (45%) when applying tooling gel coats;
(4) forty-five percent (45%) when applying pigmented production gel coats that are subject to American National Standards Institute (ANSI) standards;
(5) fifty percent (50%) when applying clear production gel coats subject to ANSI standards.

Condition D.1.3:

Condition D.1.2 shall be renumbered to Condition D.1.3, the condition description amended to specify what PM emissions the limits pertain to, and the condition's reference of "operations" shall be changed to "processes" because an operation encompasses all processes and units under a source category, (in this case, fiberglass lay-up), processes pertain to a production line or group of units that produce a specific type of product, and units pertain to the individual emissions generating equipment.

D.1.~~2~~**3 Fiberglass Lay-up Operation** Particulate Matter (PM) **Overspray Limitations** [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c) (Particulate Emission Limitations), the PM from the fiberglass ~~operations~~ **processes** (CH-1, GC1 and LAYUP) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Condition D.1.4:

The dry filter operating requirements of existing Condition D.1.6 shall be included in the Emission Limitations and Standards division as new Condition D.1.4 because requiring the dry filter systems of the fiberglass lay-up operation to be in operation at all times when the fiberglass lay-up production units are in operation is an operating requirement not a means of determining compliance.

In addition, the condition's reference of "operations" shall be changed to "processes" because an operation encompasses all processes and unit of a particular source category, (in this case, fiberglass lay-up), processes pertain to a production line or group of units that produce a specific type of product, and units pertain to the individual emissions generating equipment.

D.1.4 Fiberglass Lay-up Particulate Control Device Operation Requirements [326 IAC 6-3-2(c)]

The dry filters for PM control shall be in operation at all times when **the** fiberglass **lay-up** ~~operations~~ **processes** ~~(~~GC1, CH-1 and LAYUP~~)~~ are in operation.

Condition D.1.5:

New Condition D.1.5 shall be drafted to combine the most stringent fiberglass lay-up resin and gel coat application methods required in the 326 IAC 8-1-6 BACT and 326 IAC 20-25.

D.1.5 Fiberglass Lay-up Operation Application Method Requirements [326 IAC 20-25-3(b), (c), and (h), 326 IAC 20-25-4(1), and 326 IAC 8-1-6]

The owner or operator shall utilize the following application methods when applying the following resins and gel coats:

(a) Resin Application Methods:

The owner or operator shall apply the resins utilizing the following application methods:

(1) mechanical non-atomized application technology or manual application when applying:

(A) non-corrosion resistant unfilled production resins,
(B) Class I flame and smoke products production resins, and
(C) specialty products production resins;

and

(2) for all resins not specified in Part (a) of this Condition, the owner or operator may use manual application, mechanical non-atomized application technology, or high volume low pressure (HVLP) spray application.

The owner or operator shall not operate the mechanical non-atomized application equipment at pressures that atomize the material during the application process.

(b) Gel Coat Application Methods:

The owner or operator shall apply the gel coats utilizing manual application, mechanical non-atomized application technology, or high volume low pressure (HVLP) spray application.

* **high volume low pressure (HVLP)** ~~Air Assisted Airless (AAA)~~ **Spray Technology shall be used to apply coating to a substrate by means of coating application equipment which operates between 20 and 50 pounds per square inch gauge (psig) air pressure at the 11:1 resin pump. Their 20:1 gel coat pump will normally operate between 50 and 80 pounds per square inch gauge (psig) air pressure. If higher pressures are required to spray lower styrene resin or gel coats, appropriate documentation will be maintained.**

Condition D.1.6:

New Condition D.1.6 shall be drafted to establish the 326 IAC 20-25 work practice requirements.

D.1.6 Fiberglass Lay-up Operation Work Practice Requirements [326 IAC 20-25-3(d) and 326 IAC 20-25-4]

The owner or operator shall comply with the following work practice requirements:

(a) Changing Resins and Cleaning Resin and Gel Coat Equipment:

(1) Changing Resins:

The owner or operator shall direct all solvent sprayed during resin changes into solvent collection containers.

(2) Cleaning Resin and Gel Coat Equipment:

The owner or operator shall clean the resin and gel coat application equipment as follows:

(A) All routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, shall be conducted:

(i) utilizing solvents that do not contain any hazardous air pollutants (HAP), unless cured resins and/or gel coats are being removed from the application equipment; and
(ii) such that the solvents sprayed during clean-up or resin and/or gel coat changes are directed into solvent collection containers.

(B) All cured resins and/or gel coats removed from the application equipment may be removed by any type of solvent that has weight percent HAP contents less than or equal to the respective HAP contents of the worst case HAP containing solvents submitted in the permit application of the most recent approved permit.
(C) All other cleanup activities shall be performed utilizing solvents that do not contain any HAPs.

For the purposes of this Condition, all recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight shall be considered to contain no HAP and thus can be used for any cleaning activity.

(b) Storage of Materials:

The owner or operator shall store the following materials in closed containers:

(1) all resins and gel coats that contain hazardous air pollutants (HAPs),
(2) all other materials other than resins and gel coats that contain HAPs,
(3) all HAP containing materials stored in mixing containers with a capacity equal to or greater than fifty-five (55) gallons,
(4) all clean-up rags that contain HAPs,
(5) all waste resins and gel coats that contain HAPs, and
(6) all waste HAP containing materials that are not resins or gel coats.

All materials not listed in (b)(1) through (b)(6) may be stored in any type of container, but shall be stored in such a manner as to minimize the potential for spills and other pollutant emissions.

(c) Maintenance of Storage Containers:

The owner or operator shall maintain each container subject to the requirements of this Condition such that:

(1) there are no visible gaps when the lid is closed,
(2) each applicable container closed at all times, except when:

(A) equipment is being placed in or removed from the container,
(B) HAP containing materials are being added or removed,
(C) mixing or pumping equipment is being placed into or removed from a container, or
(D) when mixing or pumping is taking place; and

(3) the potential for spills and other pollutant emissions is minimized.

For the purposes of this Condition, gaps are defined as any open space between the side of the lid and the upper lip of the container. Openings at the top of a container for the purpose of production shall not be considered a gap provided the openings are designed to minimize the opening size.

Condition D.1.7:

New Condition D.1.7 shall be drafted to establish the 326 IAC 20-25 training requirements.

D.1.7 Fiberglass Lay-up Operation Training Requirements [326 IAC 20-25-8]

The owner or operator shall comply with the following training requirements:

All new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications, shall be trained the proper resin and gel coat handling and application techniques as follows, with each applicable employee being trained according to the schedule specified in this Condition:

(a) Training Techniques and Procedures:

The training to be given shall consist of initial and refresher training, with said initial and refresher training including, at a minimum, the appropriate:

(1) application techniques,
(2) equipment cleaning procedures,
(3) equipment setup and adjustment to minimize material usage and overspray, and
(4) other material storage and handling techniques that minimize regulated pollutant emissions.

(b) Training Schedule:

Each applicable employee shall be trained the techniques and procedures required in (a) of this Condition according to the following schedules:

(1) All applicable personnel hired after February 5, 2001, shall be trained within fifteen (15) days of hiring, unless the person(s) hired:

(A) has been trained by another owner or operator subject to 326 IAC 20-25,
(B) has written documentation demonstrating that they have up-to-date training, and
(C) has provided the documentation required in (b)(1)(B) of this Condition to the new employer.

(2) All applicable personnel hired prior to February 5, 2001, shall be evaluated by a supervisor within 30 days of the date of issuance of this permit. Should the supervisor determine that training of any evaluated employee is required, the owner or operator shall train said employee within fifteen (15) days of the evaluation.

(3) All applicable personnel subject to the training requirements of this Condition shall be given refresher training annually, to ensure that the training goals of this Condition are maintained.

Condition D.1.8:

Existing Condition D.1.3 shall be renumbered to Condition D.1.8 as a result of the previous added conditions.

D.1.~~3~~**8** Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

Condition D.1.9:

Existing Condition D.1.4 shall be renumbered to Condition D.1.9 as a result of the previous added conditions.

D.1.~~4~~**9** Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

Condition D.1.10:

Existing Condition D.1.5 shall be renumbered to Condition D.1.10 and shall be revised by taking out the reference to usage limitations because there are no usage limits in Condition D.1.1.

In addition, the actual monomer content determination and volume weighted average VOC content options of 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) shall be specified, the option to use the VOC content determinations to satisfy the "HAP" content determination requirements of Condition D.1.10 shall be added to eliminate the potential for redundant record keeping, and compliance determination requirements for the determination of the monthly VOC emissions shall be added.

~~D.1.5 Volatile Organic Compounds (VOC)~~

D.1.10 Compliance Determination, 326 IAC 8-1-6 Monomer Percent VOC Content and Emission Rate Limits

(a) The owner or operator shall determine ~~C~~**compliance** with the VOC content ~~and usage~~ limitations ~~contained in~~ **of** Condition~~s~~ D.1.1**(a)(3)** ~~shall~~ be**y** ~~determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7)~~ using**determining:**

(1) on a monthly basis, the actual monomer percent VOC content of the applicable resins and gel coats utilizing Method 24 of 40 CFR 60, Appendix A, **or**

(2) on a daily **basis, a** volume weighted average **monomer percent VOC content of all resins and a volume weighted average monomer percent VOC content of all gel coats,** using formulation data supplied by the resin and gel coating manufacturer(s), provided the Office of Air Quality determines that the formulation data used is equivalent to the Method 24 results.

Even if the owner or operator uses the approved formulation data to determine the VOC content of the resins and gel coats, the **Indiana Department of Environmental Management (**IDEM**)**, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Should all of the applicable resin and gel coat component materials consist of materials that are both VOCs and HAPs, the owner or operator may use the VOC contents of the respective resins and gel coats determined in (a)(2) of this Condition to satisfy the HAP content determination requirements of Condition D.1.11(b).

(b) The owner or operator shall determine compliance with the VOC emission rate limit of Condition D.1.1(b) by determining, on a monthly basis, the VOC emissions from all VOC containing materials used at the source in tons per month, utilizing the most recent approved version of the "Unified Emission Factors for Open Molding of Composites"*.

*** Copies of the "Compilation of Emission Factors" and "Unified Emission Factors for Open Molding of Composites" are available for copying from the Office of Air Quality, Department of Environmental Management, Indiana Government Center North, 100 North Senate Avenue, Indianapolis, Indiana.**

Condition D.1.11:

New Condition D.1.11 shall be added to establish the compliance determination requirements for the 326 IAC 20-25 monomer HAP content limits. 326 IAC 20-25 allows the source the option to use an alternative method to determine the HAP content for compliance purposes provided the method used is approved by the Office of Air Quality.

Since the 326 IAC 8-1-6 BACT has stated that a daily volume weighted average can be used to determine the VOC content of the resins and gel coats provided the formulation data used is determined, by the OAQ, to be equivalent to the Method 24 results, it is determined that the same methodology can be used to determine compliance with the "HAP" content limits of 326 IAC 20-25 (Condition D.1.2), as an alternative method.

D.1.11 Compliance Determination, 326 IAC 20-25 Monomer Percent HAP Content Limits

The owner or operator shall, on a monthly basis, determine compliance with the monomer HAP content limits of Condition D.1.2 by determining:

(a) on a monthly basis, the actual monomer percent HAP content via sampling and analysis, utilizing, as applicable, one of the following test methods:

(1) 40 CFR 60, Method 24, Appendix A (July 1, 1998)*. This method may be modified to allow measurement of the volatile HAP content of the resins or gel coats via use of uncatalyzed resin or gel coat samples, or
(2) 40 CFR 63, Method 311, Appendix A (July 1, 1998)*;

*** Copies of the Code of Federal Regulation (CFR) referenced in this section may be obtained from the Government Printing Office, Washington, D. C. 20204 or are available for copying from the Office of Air Quality, Department of Environmental Management, Indiana Government Center-North, 100 North Senate Avenue, Indianapolis, Indiana, 46206.**

or

(b) on a daily basis, a volume weighted average monomer percent HAP content of all resins and a volume weighted average monomer percent HAP content of all gel coats using formulation data supplied by the resin and gel coating manufacturer(s), provided the Office of Air Quality determines that the formulation data used is equivalent to the Method 24 results.

Condition D.1.12:

The original compliance determination requirement pertaining to the PM overspray limits (Condition D.1.6) shall be eliminated because the operating requirements of the condition have been moved to Condition D.1.4 and new Condition D.1.12 establishes more current PM overspray compliance determination requirements.

~~D.1.6 Particulate Matter (PM)~~

~~Pursuant to CP 039-4936-00188, issued on November 21, 1996, the dry filters for PM control shall be in operation at all times when the fiberglass operations (GC1, CH-1 and LAYUP) are in operation.~~

~~The overspray from the paint booths shall be considered in compliance provided that the overspray is not:~~

~~(a) visibly detectable at the exhaust; and~~

~~(b) accumulating on the rooftops or on the ground.~~

New Condition D.1.12 shall establish the PM overspray compliance determination requirements by requiring the source to verify that the placement, integrity, and particle loading capacity of the filters is adequate, verify that the dry filter system performance during normal coating booth operation is adequate, verifying that the fiberglass lay-up emissions out of the respective stacks are normal, and requiring the source to perform all additional applicable preventive measures specified in the Preventive Maintenance Plan (PMP).

D.1.12 Compliance Determination, 326 IAC 6-3-2 Particulate Matter (PM) Overspray Limits

The owner or operator shall determine compliance with the PM overspray limits of Condition D.1.3 by:

(a) performing daily inspections of the dry filter systems to determine whether or not the placement, integrity and particle loading of the filters is adequate,

(b) performing weekly observations of the overspray emissions from the fiberglass lay-up exhaust stacks to determine whether or not the dry filters are performing adequately during normal operation of the respective fiberglass lay-up processes,

(c) performing monthly inspections of the emissions from fiberglass lay-up process stacks to determine whether or not the emissions from the stack are normal and if there is overspray present on the rooftops and the nearby ground, and

(d) performing all additional inspections and observations prescribed by the Preventive Maintenance Plan.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

Condition D.1.13:

New Condition D.1.13 shall be drafted to establish the 326 IAC 8-1-6 BACT limit compliance monitoring requirements for the VOC content and monthly emission rate limits established in Condition D.1.1.

D.1.13 Compliance Monitoring, 326 IAC 8-1-6 Monomer VOC Content and Emission Rate Limits

(a) The owner or operator shall, for the monomer percent VOC content limits of Condition D.1.1(a)(3), as applicable, record either:

(1) the monthly actual resin and gel coat monomer VOC contents as determined in Condition D.1.10(a)(1),

or

(2) the daily volume weighted average resin and gel coat monomer VOC contents as determined in Condition D.1.10(a)(2).

Should the applicable resin and gel coat component materials consist of materials that are both VOCs and HAPs, the owner or operator may use the VOC contents of the respective resins and gel coats recorded in (a)(2) of this Condition to satisfy the HAP content monitoring requirements of Condition D.1.14(b).

If the owner or operator utilizes the VOC contents recorded in this Condition to satisfy the HAP monitoring requirements, the owner or operator shall also include a statement that the VOC contents are equal the HAP contents and that the recorded values are satisfying VOC and HAP content record keeping requirements of Condition D.1.17(a) and (c).

(b) The owner or operator shall, for the VOC emission rate limit of Condition D.1.1(b), record the monthly VOC emissions determined in Condition D.1.10(b).

All information required to be recorded in this Condition shall be recorded in a form that is suitable and readily available for inspection and review by the Office of Air Quality (OAQ).

Condition D.1.14:

New Condition D.1.14 shall be drafted to establish the monitoring requirements for the 326 IAC 20-25 monomer HAP content limits of Condition D.1.2.

D.1.14 Compliance Monitoring, 326 IAC 20-25 Monomer HAP Content Limits

The owner or operator shall, as applicable, record either:

(a) the actual resin and gel coat monomer percent HAP contents as determined in Condition 1.11(a),

or

(b) the daily volume weight average resin and gel coat monomer percent VOC contents as determined in Condition D.1.11(b).

All information required to be recorded in this Condition shall be recorded in a form that is suitable and readily available for inspection and review by the Office of Air Quality (OAQ).

Condition D.1.15:

The original compliance monitoring requirements pertaining to the PM overspray limits (Condition D.1.7) shall be eliminated because the monitoring requirements of new Condition D.1.15 establishes more current PM overspray compliance monitoring requirements.

~~D.1.7 Monitoring~~

~~(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

~~(b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

~~(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

Compliance monitoring for the PM overspray limit of Condition D.1.3 shall consist of recording the results of the inspections and observations required in Condition D.1.12.

D.1.15 Compliance Monitoring, 326 IAC 6-3-2 Particulate Matter (PM) Overspray Limits

The owner or operator shall, for the fiberglass lay-up process dry filter systems and exhaust:

(a) record the results of the inspections required in Condition D.1.12(a), documenting whether or not the placement, integrity and particle loading of the filters is adequate,

(b) record the results of the observations required in Condition D.1.12(b), documenting whether or not the dry filters are performing adequately during normal operation of the respective fiberglass lay-up processes,

(c) record the results of the inspections required on Condition D.1.12(c), documenting whether or not the emissions from the stack are normal and if there is overspray present on the rooftops and the nearby ground, and

(d) record the results of all additional inspections and observations specified in Condition D.1.12(d).

Should the owner or operator observe that the integrity and particle loading of the filters is not adequate, that the dry filters are not performing adequately during normal operation of the respective fiberglass lay-up processes, that there is a noticeable change in overspray emissions from the stack or surrounding evidence of abnormal overspray emissions, or that there are any parameters under the Preventive Maintenance Plan that are determined to be abnormal, the owner or operator shall take the appropriate response steps as specified in the Compliance Response Plan required in Condition C.18.

Condition D.1.16:

New Condition D.1.16 shall be drafted to establish the monitoring requirements for the operator training standards of Condition D.1.7.

D.1.16 Compliance Monitoring, 326 IAC 20-25 Operator Training Requirements

The owner or operator shall demonstrate compliance with the training requirements of Condition D.1.7 by drafting and updating (as necessary):

(a) a copy of the current training program, and

(b) a list of all current personnel, by name, that are required to be trained, the dates they were trained, and the date of the most recent refresher training.

The information required to be recorded in this Condition shall be recorded in a form that is suitable and readily available for inspection and review by the Office of Air Quality (OAQ).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

Condition D.1.17:

The existing record keeping condition (Condition D.1.8) shall be replaced by new Condition D.1.17 to update the existing record keeping requirements to coincide with the updated requirements and to incorporate the new record keeping requirements.

D.1.~~8~~**17** Record Keeping Requirements

~~(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.~~

~~(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~

~~(2) A log of the dates of use;~~

~~(3) The volume weighted VOC content of the coatings used for each month;~~

~~(4) The cleanup solvent usage for each month;~~

~~(5) The total VOC usage for each month; and~~

~~(6) The weight of VOCs emitted for each compliance period.~~

~~(b) To document compliance with Condition D.1.6 and D.1.7, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.~~

~~(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

(a) To document compliance with VOC content limits of Condition D.1.1(a)(3), the owner or operator shall maintain:

(1) a summary of the actual as applied percent VOC contents for each month, as recorded pursuant to the requirements of Condition D.1.13(a)(1), if the owner or operator determines compliance with the VOC content limits utilizing Method 24 tests specified in Condition D.1.10(a)(1).

The summary shall include the applicable month and year, the actual resin percent VOC contents, the actual gel coat percent VOC contents, and the respective resin and gel coat percent VOC content limits.

(2) a summary of the as applied daily volume weighted average resin and gel coat percent VOC contents for each month, as recorded pursuant to the requirements of Condition D.1.13(a)(2), copies of the calculations used to determine the daily volume weighted averages, copies of the as supplied and as applied VOC data sheets, if the owner or operator determines compliance with the VOC content limits utilizing the daily volume weighted averages specified in Condition D.1.10(a)(2).

The summary shall include the dates of use, the resin volume weighted average percent VOC content for that date, the gel coat volume weighted average percent VOC content for that date, and the respective resin and gel coat percent VOC content limits.

If the owner or operator utilizes the VOC record keeping requirements of (a)(2) of this condition to satisfy the HAP record keeping requirements of (c)(2) of this condition, as provided for in Condition D.1.13(a)(2), the owner or operator shall, in addition to the other records required, maintain copies of the resin and gel coat Material Safety Data Sheets (MSDS).

(b) To document compliance with VOC emission rate limits of Condition D.1.1(b), the owner or operator shall, for each month, maintain a summary of the VOC emissions generated, as recorded pursuant to the requirements of Condition D.1.13(b), copies of the calculations used to determine the VOC emissions, copies of purchase orders and invoices necessary to verify the type and amount used, and as supplied and as applied VOC data sheets.

The summary shall include the applicable month and year, the monthly VOC limit in tons per month, the amount of each resin used that month, the amount of gel coat used that month, the emission factor used to determine the emissions, the monthly VOC emissions for each resin and gel coat in tons per month, the amount of each clean-up solvent used, the amount of each reducing solvent used, the weight percent VOC of each solvent, the estimated monthly VOC emissions for each solvent in tons per month, and the total monthly VOC emissions from the fiberglass lay-up operation in tons per month.

(c) To document compliance with the monomer weight percent HAP content limits of Condition D.1.2, the owner or operator shall maintain:

(1) a summary of the actual as applied percent HAP contents for each month, as recorded pursuant to the requirements of Condition D.1.14(a), if the owner or operator determines compliance with the HAP content limits utilizing the test methods specified in Condition D.1.11(a).

The summary shall include the applicable month and year, the actual resin percent HAP contents, the actual gel coat percent HAP contents, and the respective resin and gel coat percent HAP content limits.

(2) a summary of the as applied daily volume weighted average resin and gel coat percent HAP contents for each month, as recorded pursuant to the requirements of Condition D.1.14(b), copies of the calculations used to determine the daily volume weighted averages, and copies of resin and gel coat Material Safety Data Sheets (MSDS), if the owner or operator determines compliance with the HAP content limits utilizing the daily volume weighted averages specified in Condition D.1.11(b).

The summary shall include the dates of use, the resin volume weighted average percent HAP content for that date, the gel coat volume weighted average percent HAP content for that date, and the respective resin and gel coat percent HAP content limits.

(d) To document compliance with PM overspray limits of Condition D.1.3, the owner or operator shall maintain a log of weekly overspray observations, daily and monthly inspections, and the additional inspections prescribed by the Preventive Maintenance Plan, recorded pursuant to the requirements of Condition D.1.15.

(e) To document compliance with the operator training requirements of Condition D.1.7, the owner or operator shall keep and maintain a copy of the most current updated operator-training program and a list of all trained personnel, as recorded pursuant to the requirements of Condition D.1.16.

The owner or operator need not maintain prior training programs, training information on former personnel, or prior trained personnel lists.

(f) To document compliance with the notification requirements of Condition D.1.18(c), the owner or operator shall keep and maintain a copy of all notifications submitted pursuant to the requirements of Condition D.1.18(c). Said notifications shall be in a form suitable and readily available for inspection and review by the Office of Air Quality (OAQ).

(g) To document compliance with the reporting requirements of Condition D.1.18(d), the owner or operator shall keep and maintain copies of all reports submitted pursuant to the requirements of Condition D.1.18(d). Said notifications shall be in a form suitable and readily available for inspection and review by the Office of Air Quality (OAQ).

All records except for the exemptions specified in paragraph (e) of this Condition shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Condition D.1.18:

The existing reporting condition (Condition D.1.9) shall be replaced by new Condition D.1.18 to update the existing reporting requirements to coincide with the updated requirements and to incorporate the new reporting requirements.

~~D.1.9 Reporting Requirements~~

~~A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.~~

D.1.18 Reporting Requirements

The owner or operator shall submit the following:

(a) The owner or operator shall submit the 326 IAC 8-1-6 BACT annual summary report as required in Condition D.1.1(a)(2).

(b) The owner or operator shall submit a quarterly summary of the monthly VOC emissions required in Condition D.1.17(b). Said summary shall include a copy of the summary report form included at the end of this permit, or its equivalent, and a copy of all supporting calculations, with the summary and supporting calculations being submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015,

within thirty (30) days after the end of the quarter being reported.

(c) On or before June 1, 2001, the owner or operator shall submit an initial notification to the Office of Air Quality (OAQ). Said notification shall include:

(1) the name and address of the owner or operator,
(2) the address of the physical location of the source, and
(3) a statement, signed by a responsible official, as defined in 326 IAC 2-7-1(34), verifying that the source is subject to the 326 IAC 20-25.

(d) On or before March 1, 2002, the owner or operator shall submit an initial statement of compliance to the Office of Air Quality (OAQ). Said initial statement shall include:

(1) the name and address of the owner or operator,
(2) the address of the physical location of the source, and
(3) a statement signed by a responsible official, as defined in 326 IAC 2-7-1(34), certifying:

(A) that the source achieved compliance on or before January 1, 2002,
(B) the method used to achieve compliance, and
(C) that the source is in compliance with all the requirements of this rule.

Table of Contents:

In addition, the table of contents shall be modified to reflect the changes in Section D.1.

Conclusion

The owner or operator shall operate the fiberglass lay-up operation according to the requirements specified in this Significant Permit Modification (039-15527-00188) and the other applicable requirements of existing Title V (038-7452-00188), issued on May 11, 1998.